REMARKS

Claims 1-26 are pending in this application. Claims 8, 18, 19, 20 and 22 have been amended. Claims 1-7 have been canceled without prejudice. It is respectfully submitted that no new matter has been added.

Rejections under 35 U.S.C § 103:

Claims 8-13 and 17-26 stand rejected under 35 U.S.C § 103 (a) as unpatentable over Kamikawa et al. (US 6,068,002) ("Kamikawa '002) in view of Kamikawa et al. (US 6,299,696) ("Kamikawa '696) and Kamikawa et al. (US Pub. 2003/0159718) ("Kamikawa '718).

Amended claims 8 and 20 recite, *inter alia*, a separation plate having an exhaust path of a drying fluid therein, and the exhaust path of the drying fluid passes the drying fluid from the drying room into the cleaning room. Amended claim 18 recites, *inter alia*, an exhaust path formed at a central portion of the separation plate, and the drying fluids supplied onto the substrate are exhausted from the drying room through the exhaust path and the exhausted drying fluids are passed into the cleaning room. Applicants respectfully submit that neither Kamikawa '002, Kamikawa '696, Kamikawa '718 nor any combinations thereof teaches or suggests the above claimed features.

Kamikawa '002 does not disclose or suggest an exhaust path of the drying fluid passing the drying fluid from the drying room into the cleaning room. In contrast, the separation plate (36) of Kamikawa '002 has no exhaust path such that the drying room (23) is entirely blocked from the cleaning room (22). See e.g. Fig. 4 of Kamikawa '002.

Kamikawa '696 does not disclose or suggest an exhaust path of the drying fluid passing the drying fluid from the drying room into the cleaning room. In contrast, in

Kamikawa '696, a drain pipe line (56) is connected to the central portion of the shutter (7) such that the gathered fluid is drained out of the cleaning apparatus (1). As such, the shutter (7) is not able to pass the drying fluid from the drying room into the cleaning room. See e.g., Figs. 2 and 4 of Kamikawa '696.

Kamikawa '718 does not disclose or suggest an exhaust path of the drying fluid passing the drying fluid from the drying room into the cleaning room. In contrast, the separation plate (64) of Kamikawa '718 entirely blocks the drying room (42) from the cleaning room (41). See e.g. Fig. 4 of Kamikawa '718.

Accordingly, even assuming, *arguendo*, that the above references were combined, the combination does not disclose or suggest a separation plate having an exhaust path of a drying fluid therein, and the exhaust path of the drying fluid passes the drying fluid from the drying room into the cleaning room.

Thus, claims 8, 18 and 20 are not rendered obvious by the above references. As claims 9-12, 17, 19 and 21-26 depend from claims 8, 18 and 20, respectively, they are also not rendered obvious by the above references for at least these regions.

Based on the arguments above, reconsideration and withdrawal of the rejection of claims 8-13 and 17-26 under 35 U.S.C § 103 (a) is respectfully requested.

Claims 14 and 15 stand rejected under 35 U.S.C § 103 (a) as unpatentable over '002, '718 and '696 as applied to claim 13 above and further in view of Kikuchi et al. (US 5,226,056).

As discussed above, '002, '718 and '696 do not teach or suggest a separation plate having an exhaust path of a drying fluid therein, and the exhaust path of the drying fluid passes the drying fluid from the drying room into the cleaning room, as claimed in claim

8. Kikuchi, which is only directed to a method for plasma ashing a resist film, does not cure the deficiency of '002, '718 and '696 references. Based on the above, independent claim 8 is patentable over '002, '718, '696 in view of Kikuchi. Since claims 14 and 15 depend from claim 8, claims 14 and 15 are also patentable.

Based on the arguments above, reconsideration and withdrawal of the rejection of claims 14 and 15 under 35 U.S.C § 103 (a) is respectfully requested.

Claim 16 stands rejected under 35 U.S.C § 103 (a) as unpatentable over '002, '718, '696 and Kikuchi as applied to claim 15 above and further in view of Drexter et al. (US 5,524,361).

As discussed above, '002, '718, '696 and Kikuchi do not teach or suggest a separation plate having an exhaust path of a drying fluid therein, and the exhaust path of the drying fluid passes the drying fluid from the drying room into the cleaning room, as claimed in claim 8. Drexter, which is only directed to a method of drying wood chips, does not cure the deficiency of '002, '718, '696 references and Kikuchi. Based on the above, independent claim 8 is patentable over '002, '718, '696, Kikuchi in view of Drecter. Since claim 16 depends from claim 8, claim 16 is also patentable.

Based on the arguments above, reconsideration and withdrawal of the rejection of claim 16 under 35 U.S.C § 103 (a) is respectfully requested.

For the foregoing reasons, the present application is believed to be in condition for allowance. The Examiner's early and favorable action is respectfully requested. The Examiner is invited to contact the undersigned if he has any questions or comments in this matter.

Respectfully submitted,

Frank Chau

Reg. No. 34,136

Jaewoo Park

Ltd. Rec. No. L0302

Attorneys for Applicant(s)

F. Chau & Associates, LLC 130 Woodbury Road Woodbury, New York 11797

TEL: (516) 692-8888 FAX: (516) 692-8889